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Attorney for defendant David Reid

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

CR-05-1849 JH

vs.

DAVID REID,

Defendant.

MOTION FOR MODIFICATION OF CONDITIONS
OF RELEASE (UNOPPOSED)

The defendant David Reid, by his counsel undersigned, hereby
moves this Court for an Order modifying his travel restrictions only.
Counsel undersigned has reviewed this matter with James Braun, the
Assistant United States Attorney handling this matter. Mr. Braun has no

1 objection to the entry of this Order.

2 Personnel in the office of counsel undersigned have reviewed this
3 matter with PTS personnel in both Tucson, Arizona and Albuquerque, New
4 Mexico. Mr. Reid has reviewed the details of the proposed modification
5 and the reason therefore with Nick Romero of PTS in Albuquerque. PTS
6 has no objection to this modification.
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9 Mr. Reid is a licensed commercial pilot. He has an employment
10 opportunity with a Scottsdale, Arizona based company to serve as a
11 charter pilot flying a Beech King Air 350 aircraft. Mr. Reid will complete
12 training in this aircraft in San Diego, California in mid-April. As part of his
13 job Mr. Reid will fly within the continental United States and may on very
14 limited occasions be required to fly to Canada and to Mexico. On all trips,
15 Mr. Reid will constantly be in contact with Air Traffic Control, will be on
16 continuous radar monitoring, and will be required to utilize a co-pilot on any
17 trips to Canada or Mexico. This represents an excellent employment
18 opportunity for Mr. Reid and he will have a contract for a full year of
19 employment with a guaranteed salary.
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22 Therefore, the Court is respectfully urged to allow Mr. Reid to be
23 allowed to travel in conjunction with his employment and initial training
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1 anywhere in the United States, or to Canada and/or Mexico, subject to
2 advising PTS as to where he will be going, when he will be leaving, and
3 when he will be returning, prior to commencing the trip.
4

5 No hearing is requested on this matter. A copy of this motion and the
6 proposed order are being provided to Nick Romero (PTS, New Mexico) and
7 Suzetta Frisby (PTS, Arizona). Mr. Braun has reviewed a copy of the
8 Motion and Order prior to their submission to the Court.
9

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11 RESPECTFULLY SUBMITTED this 14th day of March, 2007.

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13 LAW OFFICES OF
14 NASH & KIRCHNER, P.C.

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16 BY /S/ Walter Nash
17 WALTER NASH
18 Attorney for Defendant Reid
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of March, 2007, I served a true and correct copy of this Joinder by U.S. Mail, postage prepaid, on counsel for the United States at the address listed below:

James R.W. Braun, Esq.
Assistant United States Attorney
P.O. Box 607
Albuquerque, New Mexico 87103

/s/ Walter Nash

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